

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Delena Lorraine Reeves : Chapter 13
Debtor : No. : 21-12874-pmm

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Delena Lorraine Reeves, Debtor, by and through undersigned counsel, has filed a Motion to Modify the Chapter 13 Plan.

1. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).**
2. **If you do not want the court to grant the relief sought in the Motion** or if you want the court to consider your views on the Motion, then on or before **03/26/2025, you or your attorney must file a response to the Motion.** (*see Instructions on next page*)
3. A hearing on the Motion is scheduled to be held on 04/15/2025, at 1:00 p.m. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing conducted in the following format:
 - ☐ Telephonic via
 - ☒ Video Conference using the following link: _____. If no link is provided, the video conference link will be included on the hearing calendar.
 - ☐ In-Person participation is also available for this hearing.
4. **If you do not file a response to the Motion,** the court may cancel the hearing and enter an order granting the relief requested in the Motion.
5. You may contact the Bankruptcy Clerk's Office for Philadelphia cases at (215) 408-2800 and for Reading cases at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.
6. If a copy of the motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

Filing Instructions

1. **If you are requested to file documents electronically by Local Bankruptcy Rule 5005-2,** you must file your response electronically.
2. **If you are not required to file electronically,** you must file your response at

United States Bankruptcy Court
Eastern District of Pennsylvania
Robert N.C. Nix, Sr. Federal Courthouse
900 Market Street, Suite 400
Philadelphia, PA 19107

3. **If you mail your response** to the Bankruptcy Clerk's Office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.
4. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

Joseph Quinn, Esquire
Ross, Quinn & Ploppert, P.C.
192 S. Hanover Street, Suite 101
Pottstown, PA 19464
Ph: (610) 323-5300
Fax: (610) 323-6081

ROSS, QUINN & PLOPPERT, P.C.

By: /s/ Joseph Quinn
Joseph Quinn, Esquire
Attorney I.D. 307467
Ross, Quinn & Ploppert, P.C.
192 S. Hanover Street, Suite 101
Pottstown, PA 19464
Ph: (610) 323-5300
F: (610) 323-6081

Dated: March 5, 2025